

**472. What transactions and activities does General License 4C (“Authorizing Certain Transactions Involving Individuals or Entities Located in the Panamanian Mall and Associated Complex, Soho Panama, S.A. (a.k.a. Soho Mall Panama)”) authorize?**

If you are a U.S. person currently transacting, operating, or otherwise engaged in dealings with a non-designated individual or entity located in the designated Panamanian mall and associated complex, Soho Panama, S.A. (a.k.a. Soho Mall Panama), you are authorized to engage in transactions and other activities provided that those transactions and activities are (1) for the wind down of operations, contracts, and other agreements provided that the transactions and activities are not with a designated individual or entity and do not involve orders for shipment of goods placed after the date of designation (May 5, 2016) to the designated mall and associated complex; (2) related to building maintenance, provided the transactions and activities do not involve any Specially Designated Narcotics Traffickers other than Soho Panama S.A., Westline Enterprises, Inc. or designated entities operating in the mall; or (3) related to the provision of financial services by, for, or on behalf of non-designated financial institutions located in the designated mall and associated complex, provided the transactions do not otherwise involve financial services for any designated entity. These transactions and other activities are authorized through 12:01 a.m. eastern daylight time on January 6, 2017.

These authorized transactions and activities include: (1) the completion of shipments provided that they do not involve any orders for goods placed after the date of designation; (2) re-location, liquidation, or disposition of existing inventory; (3) processing of transactions and provision of financial services by, for, or on behalf of non-designated financial institutions that were located at the designated mall and associated complex prior to the date of designation, including financial services for non-designated entities located at the mall; (4) the provision of goods and services related to building maintenance, including the delivery and installation of repair parts; and (5) other transactions incident to the wind down of operations, contracts, or other agreements, insofar as they do not include payments, including rent payments, to the mall and associated complex.

In accordance with 31 C.F.R. 598.206(a), (1) payments made by non-designated individuals or entities located in the designated mall and associated complex, to or for the benefit of Soho Panama S.A. or Westline Enterprises, Inc., and (2) payments, refunds or other provision of funds to Soho Panama S.A. or Westline Enterprises, Inc. by U.S. persons performing maintenance pursuant to GL4C, must also be made into a blocked interest-bearing account.

A person wishing to conduct a transaction or activity not covered by an OFAC General License should submit an [online specific license application](#) to OFAC. [07-01-16]

**479. How do the restrictions in General License 4C (Authorizing Certain Transactions Involving Individuals or Entities Located in the Panamanian Mall and Associated Complex, Soho Panama, S.A. (a.k.a. Soho Mall Panama)) apply to General License 7 (Authorizing Certain Transactions and Activities Related to Importadora Maduro, S.A., Maduro Internacional, S.A., and Lindo & Maduro, S.A.)?**

Importadora Maduro, S.A., Maduro Internacional, S.A., and Lindo & Maduro, S.A. (referred to as "Felix Maduro Group") are authorized to engage in all transactions and activities as outlined in General License 7; however, any stores of the Felix Maduro Group located in the Panamanian mall and associated complex are subject to the provisions of General License 4C. [07-01-16]